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Attorneys for Plaintiff Loujain Hathloul Alhathloul

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

LOUJAIN HATHLOUL ALHATHLOUL,

Civil No. 3:21-cv-01787-IM

Plaintiff,

v.

**PLAINTIFF’S UNOPPOSED MOTION
FOR EXTENSION OF TIME TO FILE
AMENDED COMPLAINT**

DARKMATTER GROUP,
MARC BAIER,
RYAN ADAMS, and
DANIEL GERICKE

Defendants.

LOCAL RULE 7-1 CERTIFICATION

The undersigned counsel certify that counsel for Plaintiff have conferred with counsel for Defendants and Defendants do not oppose this motion.

MOTION FOR EXTENSION OF TIME TO FILE AMENDED COMPLAINT

Plaintiff Loujain Alhathloul, by and through her undersigned counsel, hereby submits this Unopposed Motion for Extension of Time to File Amended Complaint. Plaintiff seeks to extend the deadline for filing her Amended Complaint up to and until May 8, 2023.

On March 16, 2023, the Court issued its Opinion and Order Granting Defendants’ Motion to Dismiss, which dismissed Plaintiff’s Complaint “without prejudice and with leave to amend,” *see* ECF 44, at 23. Pursuant to the Court’s Order, Plaintiff filed her Notice of Intent to File an Amended Complaint on March 29, 2023, stating her intention to file an Amended Complaint “within thirty days of the issuance of [the Court’s] Opinion and Order,” which is April 17, 2023. *See* ECF 44, at 23; ECF 46, at 1.

Plaintiff now requests an additional 21 days to file her Amended Complaint, extending the deadline until May 8, 2023. This is Plaintiff's first Motion for Extension of Time to File Amended Complaint. Defendants agreed not to oppose this request.

The request comes due to Plaintiff's location overseas and precautions that must be taken to communicate with her securely, which has meaningfully delayed counsel's ability to consult with her to obtain additional information needed for the Amended Complaint. This reason provides good cause for an extension.

WHEREFORE Plaintiff hereby respectfully requests that the Court grant this unopposed motion for an extension of time to file an Amended Complaint until May 8, 2023.

Dated: April 12, 2023.

Respectfully submitted,

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